

Alex Moon

IDNR

Dear Mr. Moon:

This letter pertains to the former office building and the production building located on the Dico property in Des Moines, Iowa. This letter supersedes the letter EPA previously transmitted to you on June 8, 2017, regarding the potential demolition of the office building. I understand that IDNR is interested in pursuing demolition of these buildings on the Dico property in order to facilitate redevelopment of the property, and EPA supports this objective.

Office Building

The former office building contains no known contamination and is not subject to any EPA decision documents or administrative orders. In the absence of any documentation regarding construction or historic uses of this building, we recommend that IDNR perform an inspection of the building to evaluate the presence of asbestos and any other potential contaminants.

Since other buildings on the site contained PCBs in building insulation, it is possible that the office building contains similar material. The insulation containing PCBs was yellow batt insulation with a foil backing, and the PCBs were believed to be associated with the adhesive used to secure the foil backing onto the insulation. EPA believes it would be prudent for IDNR to determine whether this type of insulation is present within the office building, and if so, to test the insulation prior to disposal.

Given the historic use of other buildings on the property and the documented presence of pesticides and dioxins in concrete building structures on the property, we recommend that IDNR perform limited wipe testing of the office building to document the presence or absence of contamination.

EPA understands that IDNR will work with Dico to test and remove the office building under the direction and oversight of IDNR, and under the state's authority. EPA approval or oversight is not required for decisions made regarding the office building. EPA is available to assist with the sampling discussed above, if necessary.

Production Building

Like the office building, the former production building is not subject to any EPA decision documents or administrative orders. In 2016, the former production building was sampled to determine whether contamination was present. Sample results from the analysis for total concentrations of pesticides were compared to the TCLP regulatory level in 40 C.F.R. § 261.24. Seven of 15 samples exceeded a 1:1 comparison for endrine and/or heptachlor. None exceeded a 20:1 comparison. Based on this sampling,

the former production building exhibits the presence of hazardous substances, but not at levels that are expected to exhibit the characteristics of hazardous waste. Therefore materials from demolition of the production building may be disposed of as non-hazardous waste, as follows:

- EPA recommends IDNR perform an inspection of the building to evaluate the presence of asbestos prior to building demolition.
- The 2016 sampling documented low levels of PCBs within the production building, all under 1.5 ppm. IDNR should ensure that, prior to disposal of the PCB insulation within the production building, a bulk sample is collected to determine the PCB concentration of the bulk insulation prior to disposal.

It is also important for IDNR to be cognizant of the area where the former vapor degreasing vat was used in historical operations within the production building. The degreasing vat was located on the western side of the building. It is possible that subsurface soils in this area still contain high levels of volatile organic compounds (VOCs). Soil testing or removal may be necessary when this area becomes exposed following removal of the surrounding building and foundation. EPA can assist in locating the area and conducting any testing required.

EPA understands that IDNR will work with Dico to test and remove the production building under the direction and oversight of IDNR, and under the state's authority. EPA approval or oversight is not required for decisions made regarding the production building and any off-site disposal of building materials. However, if building materials are going to be disposed of on-site, IDNR or Dico would need to coordinate with EPA to ensure that the disposal is allowable under on-site disposal restrictions and is appropriate for the anticipated future use.

EPA plans to address the remaining buildings, including buildings 1-3 and the foundations of the maintenance building and buildings 4-5, under Superfund authority. Further, we retain the authority to address the production building due to the presence of hazardous substances in the event that IDNR is not successful in its efforts to have Dico remove the production building.

We appreciate the support from IDNR to address the office and production buildings and to advance the site toward redevelopment. If you have any questions regarding this letter, please contact me at (913) 551-7882.

Mary P. Peterson